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December 21, 2006

Steven Johnson, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Subject: Comments on the HPV test plan for 3,3' Dichlorobenzidine Dihydrochloride

Dear Administrator Johnson:

The following comments on the Color Pigment Manufacturers Association (CPMA) test plan for 3,3' Dichlorobenzidine Dihydrochloride are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

CPMA submitted its test plan in June 2006 for the chemical 3,3' Dichlorobenzidine Dihydrochloride (DCB) (CAS RN 612-83-9). According to the test plan, there is a wealth of data available for DCB, and so not further testing is proposed. CPMA also provides modeled data to fulfill some endpoints, such as acute toxicity to fish and invertebrates.

We support this thoughtful toxicology approach. We do, however, have a few suggestions that could improve the test plan.

Since the parent chemical, 3,3' dichlorobenzidine, is a well-studied and well-known carcinogen, it would be helpful to discuss in more detail the workplace and consumer controls in place for the chemical. For example, what processes lead the submitter to discuss closed-system intermediate status? Is personal protective equipment used? Both CSI and PPP discussions can often help fortify a test plan for which data might be available but dated or incomplete.

A more detailed discussion in the robust summary for the chronic dose toxicity and developmental toxicity entries would also help to ensure that the endpoints do fulfill the requirements of the HPV Challenge program, without conducting any further testing.

This test plan is an example of the thoughtful toxicology that is needed to be consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to the HPV program. Thank you for your

attention to these comments. We may be reached at 202-686-2210, ext. 335, or via e-mail at kstoick@perm.org with any further questions.

Sincerely,

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Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research